

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

ANTWERPEN CHEVROLET, LTD., et al.,	*	
Plaintiffs	*	Civil Action No. CCB02CV1271
vs.	*	
RESOLUTION PROVIDERS, INC., et al.,	*	
Defendants	*	
*	*	* * *

**SUPPLEMENTAL MEMORANDUM REGARDING MOTION TO COMPEL
DEFENDANTS CAROL SCOTT STEVENS AND MARK L. MCDONALD
TO APPEAR AT DEPOSITION AND MOTION FOR DEFAULT JUDGMENT
AS A SANCTION IF DEFENDANTS FAIL TO COMPLY**

Plaintiffs, Antwerpen Chevrolet, Ltd., Antwerpen Dodge, Ltd., Antwerpen Motorcars, Ltd., and J.A. Motorcars, Inc., all d/b/a Antwerpen Automotive Group (“Antwerpen”), and Argo Insurance Company (“Argo”) received Defendants Carol Scott Stevens (“Stevens”) and Mark L. McDonald (“McDonald”) opposition to their motion to compel the depositions of Stevens and McDonald in which Stevens and McDonald claimed that they were in default on their mortgage and involved in foreclosure proceedings. In response, on April 29, 2003, Plaintiffs’ counsel sent a letter to Stevens and McDonald requesting documentation that shows they are in default on their mortgage and that their home is involved in foreclosure proceedings. Plaintiffs’ counsel further requested that Stevens and McDonald provide documentation that reflects the value of their home and the outstanding amount of mortgage. See letter to Stevens and McDonald, attached hereto as **Exhibit A**.

Plaintiffs' counsel also informed Stevens and McDonald that if the documentation supported the representations they made to the court, Plaintiffs would consider dismissing the lawsuit. Despite Stevens and McDonald's assertions and Plaintiffs' offer to consider dismissing the lawsuit, Stevens and McDonald have not produced any documentation that support their assertions and, in fact, have not responded at all to Plaintiffs' counsel's letter.

May 27, 2003

Respectfully submitted,

PRICE O. GIELEN
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 28th day of May, 2003, a copy of the Supplemental Memorandum was mailed, first-class, postage prepaid, to Carl Scott Stevens and Mark L. McDonald, 111 Park Avenue, Elberon, NJ 07740.

PRICE O. GIELEN